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DIAL DIRECT (215)

972-7171

September 29, 1989

Ms. Karen Wolper
U.S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107

Re: Metro Container Administrative Order on Consent
Docket No. III-89-11-DC

Dear Karen:

Further to our conversation of September 25, Respondents propose to amend the Scope of Work in Appendix 4 of the Order to include another task in addition to those described in my letter to you of August 25. Our proposed amendment is as follows:

Paragraph 9 (new) -- Drain and clean the four sumps identified on the attached schematic drawing and cut and plug all piping to each. Line sump no. 1 with an impervious membrane, fill with an appropriate material (soil, sand, etc.), cap with clay and/or an impervious membrane, and cover with top soil and vegetation. Fill sump nos. 2, 3 and 4 with sand and include them within the cap and cover of the concrete tank described in paragraph 1. Dispose of all liquids and sludges.

Our offer to extend the Order to encompass the task described above is contingent upon approval by EPA within the next two weeks. OH Materials, the subcontractor whom we expect will be asked to perform the work described above, is presently on site. If EPA approves the task described above within the time requested, we will be able to proceed during OHM's planned stay at the site. If we do not receive approval by October 16, the offer set forth above will be withdrawn.

Diane

can you review this and


Return it.

Ms. Karen Wolper
September 29, 1989

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S. E. R. & S. No. 2

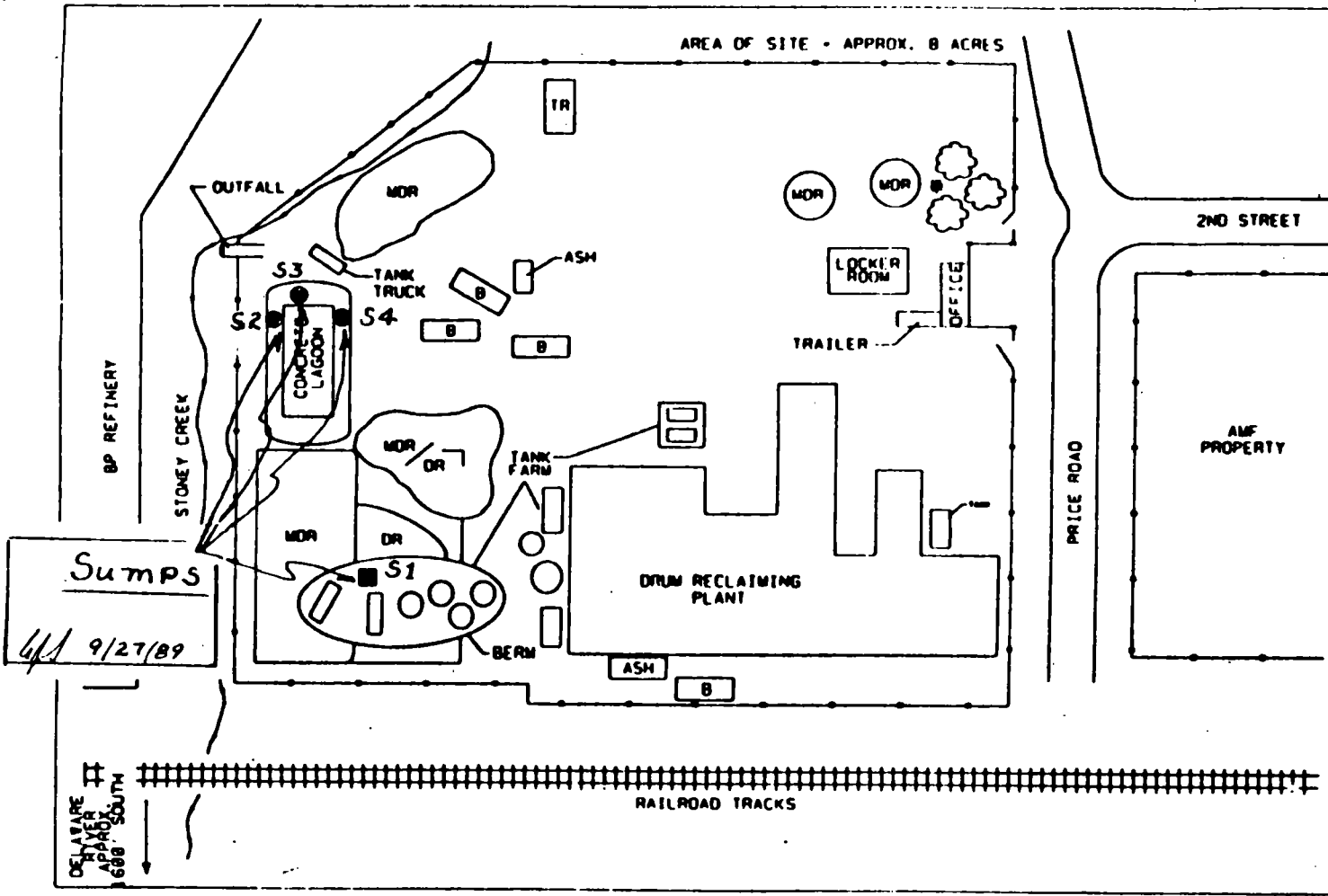
Please give me a call if you have any questions in this regard.

Sincerely,


Carl B. Everett

CBE/mml
Enclosure
cc: Diane Ajl, Esquire
Metro PRP Group
Mr. Robert Novak

PFE ORIGINAL



KEY:

- TR - TRAILER WITH RCRA EMPTY DRUMS
- MOR - PILE OF EMPTY DRUMS
- DR - SLUDGE / OIL DRUMS
- B - ROLL-OFF BOX

METRO CONTAINER SITE MAP

LAW OFFICES OF

SAUL, EWING, REMICK & SAUL

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972-7171

August 25, 1989

Ms. Karen Wolper
U.S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107

Re: Metro Container Administrative Order on Consent
No. III-89-11-DC

Dear Karen:

As we discussed, Respondents propose to amend the Scope of Work in Appendix 4 of the Order to include two additional tasks. Our proposed amendments are as follows:

Paragraph 2 -- Add the following sentence at the end of the first paragraph. "This also includes all the drums on the "AMF property" located across Price Road shown on the attached site map."

Paragraph 8 (new) -- Contaminated debris, residue and sludges from floors, floor drains and sparge lines in the Metro Container process building will be disposed. All chemicals and tank contents in the process building will be disposed. The floors of the process building will be pressure washed as will the walls to a height of five feet.

At this time, we do not expect these additional tasks to require an extension of the time period set forth in paragraph 26(c) of the Order. We shall notify you promptly if the situation changes.

The Stipulation and Order signed by Judge Balick, who has jurisdiction over the bankruptcy proceeding, appended subject Order. We plan to notify Judge Balick upon receipt of EPA's

Ms. Karen Wolper
August 25, 1989

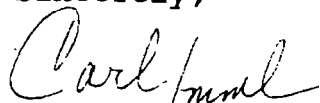
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S. E. R. & S. No.

approval of the amendments. I shall notify you of any hearing dates in the bankruptcy court relative to this matter.

Please give me a call if you have any questions in this regard.

Sincerely,


Carl B. Everett

CBE/mml

cc: Metro PRP Group
Mr. Robert Novak
Diane Ajl, Esquire

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

Mr. Carl Everett, Esquire
Saul, Ewing, Remick and Saul
3800 Center Square West
Philadelphia, Pennsylvania 19102

RE: Metro Container

Dear Mr. Everett:

The Environmental Protection Agency EPA has reviewed the revised Workplan MK-Ferguson submitted on behalf of the settling parties pursuant to the Administrative Order on Consent concerning the Metro Container Site. The revised Workplan did reflect EPA's changes; therefore, EPA will approve the Workplan. If you have any questions, feel free to contact me at (215) 597-6680.

Sincerely,

Peter Kho
Peter Kho
for Project Officer

cc: Bob Novak



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

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Carl B. Everett, Esquire
Saul, Ewing, Remick & Saul
3800 Centre Square West
Philadelphia, PA 19102

Re: Metro Container Corporation Site
Docket No. III-89-11-DC

Dear Mr. Everett:

The United States Environmental Protection Agency ("EPA") has reviewed the amendments to the above-referenced CERCLA removal Consent Order ("the Order") proposed in your letter of September 29, 1989, enclosed hereto. In accordance with the provisions of Section IX of the Order, "EFFECTIVE DATE AND SUBSEQUENT MODIFICATION," as EPA Project Officer I am approving your proposed amendments, effective today, October 10, 1989, as necessary components of the site's stabilization program. As you suggest, the amendments will constitute new paragraph 8 to the Scope of Work set forth in Appendix 4 (page 4) to the Order. You are advised that the obligations contained in this new paragraph 8 become substantive obligations of the Order itself and subject the Respondents to all of the terms and conditions of the Order.

Sincerely yours,

Peter Kho
Project Officer

Encl.

cc (w/ encl.): Diane Ajl, Esquire
Robert Novak
Karen Wolper